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ALL ACTIONS

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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

This document relates to:

PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL

Pursuant to Civil Local Rules 79-5 and 7-11 and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), and the Stipulation and Order Regarding Privilege Briefing entered by the Court today, February 5, 2021 (Dkt. No. 610), the Consolidated Plaintiffs ("Plaintiffs") hereby submit this pleading to file under seal the following Documents:

- Plaintiffs' Motion to Compel Production of Documents Related to Facebook's App Developer Investigation
- Exhibits A to Plaintiffs' Motion to Compel Production of Documents Related to Facebook's App Developer Investigation
- Proposed Order Granting Plaintiffs' Motion to Compel Production of Documents Related to Facebook's App Developer Investigation

The above-listed documents contain, reference, or summarize materials designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order entered in this action. Pursuant to the Stipulation and Order Regarding Privilege Briefing entered by the Court today, February 5, 2021 (Dkt. No. 610), Facebook will file a motion to permanently seal any portions of the parties' submissions it determines should remain under seal, or be redacted. Furthermore, as the designating party, Defendant Facebook, Inc. must file a declaration establishing that all of the designated material is sealable. See Civil L.R. 79-5(e)(1).

In light of the foregoing, Plaintiffs respectfully submit this pleading in connection with the filings and pleadings referenced above.

Dated: February 5, 2021 Respectfully submitted,

KELLER ROHRBACK L.L.P. BLEICHMAR FONTI & AULD LLP

By: <u>/s/ Derek W. Loeser</u>
Derek W. Loeser
By: <u>/s/ Lesley E. Weaver</u>
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of February, 2021, at Seattle, Washington.

/s/ Derek W. Loeser
Derek W. Loeser

CERTIFICATE OF SERVICE

I, Sarah Skaggs, hereby certify that on February 5, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

In addition, the following were served via email:

Anjeza Hassan annie.sara@yahoo.com

> /s/ Sarah Skaggs Sarah Skaggs